

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----x
UNITED STATES OF AMERICA

- v. -

CARMEN YOUNGS,
GREGORY YOUNGS,

Defendants.

-----x

COUNT ONE

The Grand Jury charges:

From in or about June 2000, through in or about March 2007, in the Southern District of New York and elsewhere, CARMEN YOUNGS and GREGORY YOUNGS, the defendants, unlawfully, willfully and knowingly, did embezzle, steal, purloin, and convert to their own use, money and things of value of the United States and a department and agency thereof, to wit, the United States Department of Housing and Urban Development, and did receive, conceal, and retain the same with intent to convert it to their own use and gain, knowing it to have been embezzled, stolen, purloined and converted, the value of which exceeded \$1,000, to wit, CARMEN YOUNGS AND GREGORY YOUNGS received approximately \$61,112.73 in federal housing subsidies, to which they were not entitled, through fraud and deceit.

(Title 18, United States Code, Sections 641 and 2.)

Grace Lamarche-Paisi
EDREPERSON

Michael J. Garcia
MICHAEL J. GARCIA
United States Attorney

USDC SDNY
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INDICTMENT

07 Cr 338

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(18 U.S.C. §§ 641 and 2)

MICHAEL J. GARCIA

United States Attorney.

A TRUE BILL

Grace Annucha Paris

Foreperson.

Post 11-1-87

4/24/07

Filed 2nd.

Ellis, Jr.